

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**PROFESSIONAL FEE MATTERS CONCERNING
THE JACKSON WALKER LAW FIRM**

Misc. No. 23-00645

**STIPULATION REGARDING THE UNITED STATES TRUSTEE’S EXPEDITED
MOTION TO QUASH SUBPOENAS**

TO THE HONORABLE JUDGE EDUARDO V. RODRIGUEZ,
CHIEF UNITED STATES BANKRUPTCY JUDGE:

On September 25, 2024, the United States Trustee filed an expedited motion to quash subpoenas pursuant to Rule 26(b)(2)(C) of the Federal Rules of Civil Procedure,¹ as made applicable by Federal Rule of Bankruptcy Procedure 9014(c). ECF No. 350 (the “**Motion**”). The Motion seeks relief regarding four subpoenas issued by Jackson Walker LLP (“**Jackson Walker**”) to (1) Kevin Epstein, the United States Trustee for Region 7 (2) Assistant United States Trustee Millie Sall and Trial Attorney Hector Duran and (3) Henry Hobbs, former Assistant United States Trustee for the Austin Office and former Acting United States Trustee for Region 7 (collectively, “**USTP Personnel**”). The Motion further alleged that while the United States Trustee anticipated that Jackson Walker would serve a fifth subpoena upon former United States Trustee Trial Attorney Stephen Statham (“**Mr. Statham**”), it had not done so as of the date the Motion was filed. *See* Motion at Fn. 2.

¹ Any further reference to a “Rule” will be in reference to the Federal Rules of Civil Procedure.

On September 26, 2024, this Court entered an order setting the Motion for hearing on October 8, 2024, and ordered that the USTP Personnel subpoenas are stayed pending further orders of the Court.

On September 27, 2024, Jackson Walker emailed to the United States Trustee a subpoena issued in the name of Mr. Statham (the “**Statham Subpoena**”).² It required the production of documents by October 2, 2024, and noticed a deposition for October 9, 2024, at 10 a.m. in Corpus Christi, Texas.³ On September 27, 2024, the parties agreed that the October 2 document production deadline would be stayed pending this Court’s ruling, and that the October 9 deposition would be subject to the Court’s ruling.

WHEREFORE, based on the above, the parties agree that the arguments raised by the United States Trustee in the Motion and Jackson Walker’s objection thereto shall apply equally to the subpoena issued to Mr. Statham.

Date: October 7, 2024

Stipulated and Agreed,

KEVIN M. EPSTEIN
UNITED STATES TRUSTEE
REGION 7, SOUTHERN AND WESTERN
DISTRICTS OF TEXAS

By: /s/ Vianey Garza

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² The Statham Subpoena has been filed as an exhibit for the October 8, 2024, hearing. Jackson Walker previously emailed a similar subpoena for Mr. Statham to the U.S. Trustee on August 12, 2024, which requested Mr. Statham’s deposition to be held on September 16, 2024, and required documents to be produced by September 9, 2024. The U.S. Trustee advised Jackson Walker that he was not then and is not now authorized to accept service on behalf of Mr. Statham.

³ The parties and Mr. Statham subsequently agreed to change the time of the deposition to 1:00 p.m. CT if the Court permits the deposition to proceed.

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Counsel for Jackson Walker LLP

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2024 a copy of the foregoing was served on parties receiving notice by CM/ECF.

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